


# **EXHIBIT 75**

## STANDARD OPERATING PROCEDURE

		<b>Title:</b> <b>NEW ACCOUNT APPROVAL &amp; EXISTING ACCOUNT REVIEW</b>	
<b>No.: DEA-53015</b>		<b>Version: 00</b>	<b>Effective: 12/23/2013</b>
<b>Department: DEA COMPLIANCE</b>			

**PURPOSE:** This SOP outlines the review and approval process for new Controlled Substance accounts as well as annual or for cause reviews of existing Controlled Substance accounts, including those customers requesting to order Controlled Substances for the first time.

**SCOPE:** This SOP applies to all customers in all trade classes that purchase Controlled Substances and/or List 1 Chemicals.

**DEFINITIONS:** Pharmaceutical Diversion Excessive purchases of Controlled Substances or List1 chemicals with intent of illicit use or distribution.

Controlled Substances A drug or other substance, or immediate precursor, included in schedule I, II, III, IV, or V in Title 21 U.S.C.

List 1 Chemicals A chemical specified by regulation of the Attorney General as a chemical that is used in manufacturing a controlled substance in violation of Title 21 U.S.C. and is important to the manufacture of the controlled substance.

**RESPONSIBILITY:** The Qualitest Sales team has the primary responsibility of collecting all of the required documents and licenses and submitting them to the SOM Team.


The SOM Team has the responsibility of reviewing all required documents and licenses. The Director, DEA Compliance or Manager, Customer Due Diligence & SOM have the responsibility for final approval of customers for shipment of Controlled Substances after determining risk of diversion.

**SAFETY:** N/A

**REFERENCES:** N/A

**ATTACHMENTS:** Retail Customer Questionnaire  
Wholesale / Chain Warehouse Questionnaire

*Please discard any electronic printouts after 24 hours. 9/21/2018*

		Title: <b>NEW ACCOUNT APPROVAL &amp; EXISTING  ACCOUNT REVIEW</b>	
No.: <b>DEA-53015</b>		Version: <b>00</b>	Effective: <b>12/23/2013</b>
Department: <b>DEA COMPLIANCE</b>			


PROCEDURE:

I. General

- A. Prior to the initial sale of Controlled Substances and List 1 Chemicals, the SOM Team conducts a thorough review and research of the customer including ownership. If the research concludes that the potential customer poses an unreasonable risk for diversion of Controlled Substances and/or List 1 chemicals, the customer will be blocked from ordering Controlled Substances and/or List 1 Chemicals.

II. Know Your Customer

- A. The Sales team sends the appropriate customer Questionnaire to the potential customer based on class of trade. The completed Questionnaire and supporting documentation is sent to the SOM group mailbox.
- B. The SOM team reviews and validates the information provided by the customer. This information includes but is not limited to:
1. Name, address, phone and website
  2. State and DEA licenses are verified and any disciplinary action is researched
  3. Ownership information. Research owners and corporate officers
  4. Affiliation with internet pharmacies.
  5. Affidavit of compliance with regulations relating to Controlled Substances
- C. If the new customer is a direct sale retail pharmacy, the following additional research is conducted to help determine risk of diversion of Controlled Substances and to assist in establishing proper boundaries that minimize company risk while serving the customers legitimate need. Listed below are some of the criteria that would be reviewed:
1. 12 month dispensing history (except in GA and other states where prohibited by state regulations.)
  2. Average number of prescriptions filled each week or month
  3. Percentage of Controlled Substances prescriptions filled
  4. Percentage of business paid in cash
  5. Top 5 prescribers of Controlled Substances
  6. Comparison to other pharmacies in same class and size
  7. SOP or detailed summary of SOM program
- D. If the new customer is a wholesaler/distributor or chain warehouse the following additional research is conducted after section "b" is completed:

		Title: <b>NEW ACCOUNT APPROVAL &amp; EXISTING ACCOUNT REVIEW</b>	
No.: <b>DEA-53015</b>		Version: <b>00</b>	Effective: <b>12/23/2013</b>
Department: <b>DEA COMPLIANCE</b>			

1. Number of customers in each class of trade by state
  2. Current SOP or detailed summary of current SOM program
  3. If customer has more than one facility, information is obtained for each facility
  4. If customer has a regional or national logistics center, obtain information for each facility serviced including number of customers in each state
  5. If a retail chain warehouse, obtain the number of stores serviced in each state
- E. If red flags are identified during review, the SOM team may request additional information related to the red flag from the potential customer.
- F. The final decision to approve or reject the account with regard to the ability to order Controlled Substances or List 1 Chemicals is made on whether the customer poses an unreasonable risk for the diversion of Controlled Substances.
- G. All information related to the final decision must be documented and saved pursuant to the Record Retention Policy.

---

END SOP

REVISION HISTORY:  
REV00 – New SOP